

Appl. No. 10/002,372  
Amdt. Dated June 14, 2005  
Reply to Office action of March 17, 2005  
Attorney Docket No. P14681-US1  
EUS/J/P/05-3136

### **REMARKS/ARGUMENTS**

#### **Claim Amendments**

The Applicant has amended claims 1 and 3 and claim 2 has been canceled. Applicant respectfully submits no new matter has been added. Accordingly, claims 1, and 3-18 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

#### **Claim Rejections – 35 U.S.C. § 102(e)**

Claims 1-18 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Bright (US 2002/0169883 A1). The Applicant respectfully traverses the rejection of these claims. In order to expedite allowance of this application, the Applicant has canceled claim 2 without prejudice. Therefore, this rejection with respect to this claims is deemed to be moot. The Applicant has amended claims 1 and 3 to better define the intended scope of the claimed invention.

The Bright reference appears to disclose a multiple-protocol (MP) home location register (HLR) that is arranged and constructed to generate network messages according to the network protocols and to process a network request. The MP HLR comprises two HLRs, each HLR being of a different protocol and each HLR connects to a common mediation device (MD), which provides "...a number functions including generating network messages, translating network messages, and emulating GMSCs, VMSCs, and MCs." (section 0052). The Bright reference requires a mediation device for translation and emulation of the different network protocols to a common protocol.

The Applicant's invention discloses a system and method for providing intelligent network services to subscribers from networks using different protocols. For example, in an ANSI-41 network, an HLR and the MSC/VLR are modified by storing a special Preferred Inter-exchange Carrier (PIC) category for each subscriber seeking access in a subscriber database in the HLR. When a subscriber desires to utilize an IN service, the PIC category associated with the subscriber is translated to a special Carrier Identification Code (CIC) that is associated with the desired IN service. A CIC-based traffic router analyzes the CIC code and routes the call to an IN Service Switching Point,

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rather than an IEC. This allows the network to properly route the subscriber to the network on which the subscriber is capable of operating. The IN is then provided through an IN-SCP and IN-SDP.

In a GSM network a PIC category is stored in the subscriber's database in the HLR. When the subscriber originates or receives a call requiring the IN service the PIC category is translated to a special CIC code in a PIC-to-CIC translator in the MSC/VLR. The CIC code is then used in a CIC-based router to route the call to the IN-SSP.

In a wireline network, the End Office (EO) is modified to provide access to the IN. A PIC category associated with a subscriber is stored in a subscriber database. When the subscriber originates or receives a call the PIC category is translated to a special CIC in a PIC-to-CIC translator in the EO. The CIC is then utilized in a CIC-based traffic router to route the call to the IN-SSP.

In amended claim 1 of the Applicant's invention, an Equal Access function is utilized in conjunction with a PIC category. The PIC category is stored in the subscriber database and when access to the IN is indicated, the PIC is translated into the CIC so that the subscriber is directed to the IN.

The Bright reference generates and/or translates network messages according to multiple different network protocols and is coupled to multiple HLRs, each supporting a different one of the multiple network protocols (section 26). The Applicant's invention utilizes special coding residing in the subscriber database in the HLR, the MSC/VLR or the EO according to the network, in order to provide IN service to a subscriber. The codes are translated so as to provide the subscriber access to the IN service. With regard to the difference between Bright and the Applicant's invention, the Applicant's invention utilizes existing hardware but adds coding to provide the access to the IN service. Bright adds hardware or at least requires additional hardware such as the extra HLR with a different protocol and the mediation device. The Applicant respectfully request the withdrawal of the rejection of claim 1.

Claims 5, 12 and 14 contain limitations similar to those in claim 1. In claim 5, the use of a special CIC code associated with the subscriber to access the IN service is not found in the Bright reference. In claims 12 and 14, the limitations of assigning a PIC

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category to the subscriber and translating the PIC to a special CIC prior to accessing the IN service are not found in the Bright reference.

Claims 2-4, 6-11, 13 and 15-18 depend from the respective independent claims and recite further limitations in combination with the novel elements of the respective independent claims. Therefore, the allowance of claims 1-18 is respectfully requested.

#### **Prior Art Not Relied Upon**

In paragraph 3 on page 8 of the Office Action, the Examiner stated that the prior art made of record and not relied upon is considered pertinent to the Applicant's disclosure.

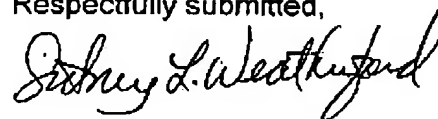
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### CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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